

As a 501(c)(6) association, removing the established business relationship qualifications from the fax regulations will cripple our ability to deliver required continuing legal education. The proposed change flies in the face of why associations exist in the first place - the freedom to choose to affiliate with others of like or common self-interests! If our members affiliate by choice and pay dues, they have already established the fact that they seek the information and benefits that an association provides. When the financial services privacy laws changed, the government did not require credit institutions to get my signed permission to be harassed by their affiliates - I had to take the initiative to opt out of their solicitations. The same is true regarding telemarketers. I have to add my name to a national list to opt out of being called. It appears that the Federal government can't be consistent across agencies or even within this agency as to the approach to take. Non-profit organizations should have the same consideration - if members don't want our faxes, then they should let us know - that would be consistent with the telemarketing solution!